



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

MAJOR SOURCE OPERATING PERMIT

Permittee: **Dunbarton Corporation**

Facility Name: Rediframe Division

Facility No.: 607-0032

Location: Dothan

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, **Code of Alabama 1975**, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, **Code of Alabama 1975**, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Issuance Date:		
Expiration Date:		

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Fede	erally Enforceable Provisos	Regulations
1.	Transfer	
	This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-1613(1)(a)5.	Rule 335-3-1602(6)
2.	Renewals	
	An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	Rule 335-3-1612(2)
	The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3.	Severability Clause	
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	Rule 335-3-1605(e)
4.	Compliance	
	(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-1605(f)

Fed	erally Enforceable Provisos	Regulations
	(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	Rule 335-3-1605(g)
5 .	<u>Termination for Cause</u>	
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	Rule 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-1605(i)
7.	Submission of Information	
	The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness:	
	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state	Rule 335-3-1607(a)

Fede	rally l	Enforceable Provisos	Regulations
	reas	based on information and belief formed after onable inquiry, the statements and information in the iment are true, accurate and complete.	
10.	Insp	ection and Entry	
	may repr Envi	n presentation of credentials and other documents as be required by law, the permittee shall allow authorized esentatives of the Alabama Department of ronmental Management and EPA to conduct the wing:	Rule 335-3-1607(b)
	(a)	Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;	
	(b)	Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	
	(c)	Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;	
	(d)	Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11.	Com	pliance Provisions	
	(a)	The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-1607(c)
	(b)	The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12 .	Com	pliance Certification	
		mpliance certification shall be submitted annually in 60 days of the anniversary date of issuance of this nit.	Rule 335-3-1607(e)

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	(a)		compliance certification shall include the wing:	
		(1)	The identification of each term or condition of this permit that is the basis of the certification;	
		(2)	The compliance status;	
		(3)	The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-1605(c) (Monitoring and Recordkeeping Requirements);	
		(4)	Whether compliance has been continuous or intermittent;	
		(5)	Such other facts as the Department may require to determine the compliance status of the source;	
	(b)	The	compliance certification shall be submitted to:	
	Ala	bama I	Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463	
			and to:	
		Ai	r and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13.	Reo	pening		
		•	of the following circumstances, this permit will be rior to the expiration of the permit:	Rule 335-3-1613(5)
	(a)	Air A with years than	tional applicable requirements under the Clean act of 1990 become applicable to the permittee a remaining permit term of three (3) or more s. Such a reopening shall be completed not later eighteen (18) months after promulgation of the icable requirement. No such reopening is	

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			red if the effective date of the requirement is than the date on which this permit is due to e.	
	(b)	requi source by th	ional requirements (including excess emissions rements) become applicable to an affected e under the acid rain program. Upon approval e Administrator, excess emissions offset plans be deemed to be incorporated into this permit.	
	(c)	conta state	Department or EPA determines that this permit ins a material mistake or that inaccurate ments were made in establishing the emissions lards or other terms or conditions of this permit.	
	(d)	this p	administrator or the Department determines that permit must be revised or revoked to assure cliance with the applicable requirements.	
14.	<u>Add</u>	itional	Rules and Regulations	
	exist Rule	ting on test and R	is issued on the basis of Rules and Regulations the date of issuance. In the event additional Regulations are adopted, it shall be the permit ponsibility to comply with such rules.	§22-28-16(d), Code of Alabama 1975, as amended
15.	Equ	ipment	Maintenance or Breakdown	
	(a)	equip issue main equip twent shutc the sl inten	e case of shutdown of air pollution control oment (which operates pursuant to any permit d by the Director) for necessary scheduled tenance, the intent to shut down such oment shall be reported to the Director at least cy-four (24) hours prior to the planned down, unless such shutdown is accompanied by hutdown of the source which such equipment is ded to control. Such prior notice shall include, a not limited to the following:	Rule 335-3-107(1), (2)
		(1)	Identification of the specific facility to be taken out of service as well as its location and permit number;	
		(2)	The expected length of time that the air pollution control equipment will be out of	

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			service;	
		(3)	The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
		(4)	Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
		(5)	The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
	(b)	or up is expond stand shall work pertine	e event that there is a breakdown of equipment oset of process in such a manner as to cause, or pected to cause, increased emissions of air aminants which are above an applicable dard, the person responsible for such equipment notify the Director within 24 hours or the next ing day and provide a statement giving all nent facts, including the estimated duration of breakdown. The Director shall be notified when breakdown has been corrected.	
l 6 .	Ope	ration		
	whice operations operated the analysis as to	h this pated at sions of the si	tion control devices and capture systems for permit is issued shall be maintained and all times in a manner so as to minimize the of air contaminants. Procedures for ensuring that quipment is properly operated and maintained so hize the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended
17.	<u>Obn</u>	oxious	Odors	
	obnoverification odor	oxious o ied by A ous em Alabam	is issued with the condition that, should odors arising from the plant operations be Air Division inspectors, measures to abate the dissions shall be taken upon a determination by a Department of Environmental Management measures are technically and economically	Rule 335-3-108

Fede	rally E	nforce	Regulations	
18.	Fugit	tive Dı	<u>ust</u>	
	(a)	emar	nutions shall be taken to prevent fugitive dust nating from plant roads, grounds, stockpiles, ens, dryers, hoppers, ductwork, etc.	Rule 335-3-402
	(b)	in the airbo follov	t or haul roads and grounds will be maintained the following manner so that dust will not become torne. A minimum of one, or a combination, of the wing methods shall be utilized to minimize torne dust from plant or haul roads and grounds:	
		(1)	By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
		(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
		(3)	By paving;	
		(4)	By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;	
	adequand general exclusion contraction Alternative and a contraction and a contracti	uately : ground sively o ol tech native :	, or a combination, of the above methods fail to reduce airborne dust from plant or haul roads s, alternative methods shall be employed, either or in combination with one or all of the above iniques, so that dust will not become airborne. methods shall be approved by the Department ization.	
19.	<u>Addi</u>	tions a	and Revisions	
			eations to this source shall comply with the procedures in Rules 335-3-1613 or 335-3-16-	Rule 335-3-1613 and .14
20.	Reco	rdkeej	ping Requirements	
	(a)		rds of required monitoring information of the ce shall include the following:	Rule 335-3-1605(c)2.

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		(1)	The date, place, and time of all sampling or measurements;	
		(2)	The date analyses were performed;	
		(3)	The company or entity that performed the analyses;	
		(4)	The analytical techniques or methods used;	
		(5)	The results of all analyses; and	
		(6)	The operating conditions that existed at the time of sampling or measurement.	
	(b)	and at least sample sam	ntion of records of all required monitoring data support information of the source for a period of ast 5 years from the date of the monitoring ple, measurement, report, or application. For information includes all calibration and attenance records and all original strip-chart redings for continuous monitoring instrumentation copies of all reports required by the permit	
21.	Rep	orting	Requirements	
	(a)	shall insta mus repo	orts to the Department of any required monitoring be submitted at least every 6 months. All ances of deviations from permit requirements to be clearly identified in said reports. All required rts must be certified by a responsible official istent with Rule 335-3-1604(9).	Rule 335-3-1605(c)3.
	(b)	report deviation cond inclu any	ations from permit requirements shall be rted within 48 hours or 2 working days of such ations, including those attributable to upset litions as defined in the permit. The report will ade the probable cause of said deviations, and corrective actions or preventive measures that taken.	
22.	<u>Emi</u>	ssion 1	Testing Requirements	
	prov	ided wi	of emission which requires testing will be ith sampling ports, ladders, platforms, and other pment to facilitate testing performed in	Rule 335-3-105(3) and Rule 335-3-1-

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	40 of	rdance with procedures established by Part 60 of Title the Code of Federal Regulations, as the same may be nded or revised.	.04(1)
	in ad subn	Air Division must be notified in writing at least 10 days vance of all emission tests to be conducted and nitted as proof of compliance with the Department's air tion control rules and regulations.	
	proce	roid problems concerning testing methods and edures, the following shall be included with the cation letter:	
	(1)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	Rule 335-3-104
	(2)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	
	(3)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
	(4)	A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
	owne and t	etest meeting may be held at the request of the source or or the Air Division. The necessity for such a meeting the required attendees will be determined on a case-by- basis.	Rule 335-3-104
	30 da	st reports must be submitted to the Air Division within ays of the actual completion of the test unless an asion of time is specifically approved by the Air Division.	
23.	Payn	nent of Emission Fees	

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		ual emission fees shall be remitted each year according ne fee schedule in ADEM Admin. Code R. 335-1-704.	Rule 335-1-704	
24.	Othe	er Reporting and Testing Requirements		
	fuel may pollu	mission of other reports regarding monitoring records, analyses, operating rates, and equipment malfunctions be required as authorized in the Department's air ution control rules and regulations. The Department require emission testing at any time.	Rule 335-3-104(1)	
25 .	<u>Title</u>	e VI Requirements (Refrigerants)		
	inclu Clas 82, S and prac recyc	facility having appliances or refrigeration equipment, ading air conditioning equipment, which use Class I or is II ozone-depleting substances as listed in 40 CFR Part Subpart A, Appendices A and B, shall service, repair, maintain such equipment according to the work stices, personnel certification requirements, and certified cling and recovery equipment specified in 40 CFR Part Subpart F.	335-3-1605(a)	
	Clas the r	person shall knowingly vent or otherwise release any as I or Class II substance into the environment during repair, servicing, maintenance, or disposal of any device upt as provided in 40 CFR Part 82, Subpart F.		
	reco	responsible official shall comply with all reporting and rdkeeping requirements of 40 CFR 82.166. Reports l be submitted to the US EPA and the Department as sired.		
26 .	Che	mical Accidental Prevention Provisions		
	pres	chemical listed in Table 1 of 40 CFR Part 68.130 is ent in a process in quantities greater than the threshold ntity listed in Table 1, then:	40 CFR Part 68	
	(a)	The owner or operator shall comply with the provisions in 40 CFR Part 68.		
	(b)	The owner or operator shall submit one of the following:		
		(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date		

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			provided in 40 CFR Part 68 § 68.10(a) or,	
		(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27 .	<u>Disp</u>	lay of	<u>Permit</u>	
	at the locat	e site v ed and	shall be kept under file or on display at all times where the facility for which the permit is issued is will be made readily available for inspection by ersons who may request to see it.	Rule 335-3-1401(1)(d)
28.	Circu	umven	<u>tion</u>	
	any o reduce	device o ction ir eals or	shall cause or permit the installation or use of or any means which, without resulting in the total amount of air contaminant emitted, dilutes any emission of air contaminant which wise violate the Division 3 rules and regulations.	Rule 335-3-110
29.	<u>Visib</u>	le Em	<u>issions</u>	
	Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.			Rule 335-3-401(1)
30.	<u>Fuel</u>	-Burni	ng Equipment	
	(a)	provi may	ss otherwise specified in the Unit Specific sos of this permit, no fuel-burning equipment discharge particulate emissions in excess of the sions specified in Rule 335-3-403.	Rule 335-3-403
	(b)	provi may	ss otherwise specified in the Unit Specific sos of this permit, no fuel-burning equipment discharge sulfur dioxide emissions in excess of missions specified in Rule 335-3-501.	Rule 335-3-501

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31.	Process Industries – General	
	Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Rule 335-3-404.	Rule 335-3-404
32 .	Averaging Time for Emission Limits	
	Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	Rule 335-3-105

Paint Line Permit Summary

Emission Unit(s): Coating Line with washer, dryer, paint booth

and bake oven

Designation No(s). in Application: 001

Company: Dunbarton Corporation Rediframe Division

Description: Coating of Metal doors, sashes, frames,

moldings, and trim.

Permitted Operating Schedule: 24 hr/day x 365 days/yr. = 8760 hr/yr.

Type and quantity of fuel used:

Primary: Natural Gas

Secondary: Propane

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	245 tons in any consecutive 12-months	Synthetic Minor PSD
HAPs	9.9 tons of a single HAP in any consecutive 12 months or 24.9 tons of a combination of HAPs in any consecutive 12 months	Synthetic Minor

Rediframe Paint Line Provisos

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Sec	tion 1—Applicability	
1.	This source is subject to a PSD synthetic minor emission limit.	ADEM Admin. Code R. 335-3-1404
2.	This source is subject to a HAP synthetic minor emission limit.	ADEM Admin. Code R. 335-3-1404
Sec	tion 2—Emission Standards	
1.	Emissions of Volatile Organic Compounds (VOCs) shall not exceed 245 tons in any consecutive rolling 12-month period.	ADEM Admin. Code R. 335-3-1404(8)
2.	Emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 tons of a single HAP in any 12 consecutive months or 24.9 tons of a combination of HAPs in any 12 consecutive months.	ADEM Admin. Code R. 335-3-1404(8)
	tion 3Compliance and Performance Test Methods and cedures	
1.	The HAPs content by weight of each HAPs containing material used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-1106(35)
2.	The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-104
Sec	tion 4Emission Monitoring	
1.	The monitoring requirements in this permit shall be as required in Section 5Recordkeeping and Reporting Requirements.	
Sec	tion 5—Recordkeeping and Reporting Requirements	
1.	Accurate and understandable records of VOC consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:	ADEM Admin. Code R. 335-3-104
	(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material	

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used during each calendar month.

- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with this proviso shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 15 days of each month, compliance with all provisions in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the in this permit, the Air division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code R.335-3-1-.04

2. Accurate and understandable records of HAP consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records

ADEM Admin. Code R. 335-3-1-.04

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shall contain the following information:

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with this proviso shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.
- (f) The amount of HAPs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of HAPs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 15 days of each month, compliance with all provisions in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the in this permit, the Air division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code R.335-3-1-.04

3. A report summarizing the information in provisos 5.1 and 5.2 shall be submitted every six months in a format approved by the Department in advance. These

ADEM Admin. Code R. 335-3-1-.04

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reports are due by January 15 and July 15 each year.		